

1 AARON D. FORD
2 Attorney General
3 MARK HACKMANN, Bar No. 16704
4 Deputy Attorney General
5 Office of the Attorney General
6 State of Nevada
7 100 N. Carson Street
8 Carson City, NV 89701-4717
9 Tel: (775) 684-1227
10 mhackmann@ag.nv.gov

11 *Attorneys for Defendants,*
12 *Teresa Clark, Gloria Carpenter,*
13 *David Drummond, William Gittere,*
14 *Dennis Homan, Dawn Jones,*
15 *William Reubart, Jon Verde,*
16 *and Harold Wickham*

17 BENJAMIN ESPINOSA,

18 Plaintiff,

19 vs.

20 WILLIAM GITTERE, et al.,

21 Defendants.

22 Case No. 3:21-cv-00205-ART-CLB

23 **NOTICE OF APPEAL**

24 Defendants, Teresa Clark, Gloria Carpenter, David Drummond, William Gittere,
25 Dennis Homan, Dawn Jones, William Reubart, Jon Verde and Harold Wickham, by and
26 through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Mark
27 Hackmann, Deputy Attorney General, of the State of Nevada, Office of the Attorney
28 General, hereby pursuant to Fed R. App. P. 3 & 4 and 28 U.S.C. § 1291, appeal this Court's
Order (ECF NO. 102, filed on February 4, 2025, and EFC No. 106, filed on February 27,
2025) to the extent that it denies Defendants' motion for summary judgment asserting
immunity from suit, including but not limited to qualified immunity and Eleventh

29 ///

30 ///

31 ///

1 Amendment immunity, which denial is immediately appealable and once appealed divest
2 the district court of jurisdiction.

3 DATED this 6th day of March 2025.

4 AARON D. FORD
5 Attorney General

6 By: /s/ *Mark Hackmann*
7 MARK HACKMANN, Bar No. 16704
Deputy Attorney General

8 *Attorneys for Defendants*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on March 6, 2025, I electronically filed the foregoing, **NOTICE OF APPEAL**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Benjamin Espinosa #74296
Northern Nevada Correctional Center
P.O. Box 7000
Carson City, NV 89702

/s/ Karen Easton
An employee of the
Office of the Attorney General